

MALCOLM PIRNIE

POTENTIAL HAZARDOUS WASTE SITE PRELIMINARY ASSESSMENT

RFE Industries

NJD981490803

370

Site Name

Site ID Number

Aetna Street

Jersey City, Hudson Co., NJ

Address

City, State

Date of Off-Site Reconnaissance May 8, 1986

SITE DESCRIPTION

RFE (Refinery For Electronics, Aetna Refinery) is located at the foot of Jersey Avenue along the Morris Canal. The facility reclaims gold from dross and electrical equipment. The plant has been cited for illegally discharging wastewater into the canal in 1980. In addition, RFE used a leaching pit at the rear of the plant to reclaim metals. The pit was removed in 1981 but no soil remediation was undertaken. At present, NJDEP is involved with a RCRA Part B permit action. No other enforcement activity is under way.

PRIORITY FOR FURTHER ACTION: High ☐ Medium ☒ Low ☐ None ☐

RECOMMENDATIONS

A site investigation is recommended to determine the extent of soil and water contamination from site operations.

Prepared by: Meryl Alexander

Date: May 28, 1986

Of: Malcolm Pirnie, Inc.

266563



MALCOLM PIRNIE

POTENTIAL HAZARDOUS WASTE SITE PRELIMINARY ASSESSMENT

UJ098 1496303
370

RFE Industries

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Prepared by: Meryl Alexander

Date: May 28, 1986

Of: Malcolm Pirnie, Inc.



POTENTIAL HAZARDOUS WASTE SITE
PRELIMINARY ASSESSMENT
PART 1-SITE INFORMATION AND ASSESSMENT

I. IDENTIFICATION
01 STATE 02 SITE NUMBER
NJ 370

II. SITE NAME AND LOCATION

01 SITE NAME (Legal, common, or descriptive name of site) RFE Industries		02 STREET, ROUTE NO., OR SPECIFIC LOCATION IDENTIFIER Aetna Street			
03 CITY Jersey City	04 STATE NJ	05 ZIP CODE 07302	06 COUNTY Hudson	07 COUNTY CODE	08 CONG. DIST.
09 COORDINATES LATITUDE 40-42-45.0		LONGITUDE 74-03-12.0		BLOCK 2145 LOT 41R, 41S	

10 DIRECTIONS TO SITE (Starting from nearest public road) NJ Turnpike Exit 14C to Grand Avenue. Proceed East to Jersey Avenue, turn right. At end of block turn right onto Aetna Street.

III. RESPONSIBLE PARTIES

01 OWNER (If known) RFE Industries, Inc.		02 STREET (Business, mailing, residential) 275 Hobart Street			
03 CITY Perth Amboy	04 STATE NJ	05 ZIP CODE	06 TELEPHONE NUMBER (201)-8269500		
07 OPERATOR (If known and different from owner)		08 STREET (Business, mailing, residential)			
09 CITY	10 STATE	11 ZIP CODE	12 TELEPHONE NUMBER ()		
13 TYPE OF OWNERSHIP (Check one) <input checked="" type="checkbox"/> A. PRIVATE <input type="checkbox"/> B. FEDERAL <input type="checkbox"/> C. STATE <input type="checkbox"/> D. COUNTY <input type="checkbox"/> E. MUNICIPAL <input type="checkbox"/> F. OTHER (Specify) <input type="checkbox"/> G. UNKNOWN					

14 OWNER/OPERATOR NOTIFICATION ON FILE (Check all that apply)

☒ A. RCRA 3001 DATE RECEIVED: MONTH DAY YEAR ☐ B. UNCONTROLLED WASTE (CERCLA 103e) DATE RECEIVED: MONTH DAY YEAR ☐ C. NONE

IV. CHARACTERIZATION OF POTENTIAL HAZARD

01 ON SITE INSPECTION <input checked="" type="checkbox"/> YES DATE Numerous MONTH DAY YEAR <input type="checkbox"/> NO		BY (Check all that apply) <input checked="" type="checkbox"/> A. EPA <input type="checkbox"/> B. EPA CONTRACTOR <input checked="" type="checkbox"/> C. STATE <input type="checkbox"/> D. OTHER CONTRACTOR <input type="checkbox"/> E. LOCAL HEALTH OFFICIAL <input type="checkbox"/> F. OTHER (Specify)			
02 SITE STATUS (Check one) <input checked="" type="checkbox"/> A. ACTIVE <input type="checkbox"/> B. INACTIVE <input type="checkbox"/> C. UNKNOWN		03 YEARS OF OPERATION BEGINNING YEAR ENDING YEAR <input checked="" type="checkbox"/> UNKNOWN			

04 DESCRIPTION OF SUBSTANCES POSSIBLY PRESENT, KNOWN, OR ALLEGED

The plant generates and stores in drums and tanks: potassium cyanide, acids, lead, and corrosive wastes. (Attachments B, F)

05 DESCRIPTION OF POTENTIAL HAZARD TO ENVIRONMENT AND/OR POPULATION

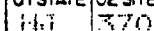
Jersey City Health Department alleges RFE maintained a leaching pit on the site. A potential exists for contamination of soils, air, and surface waters near the site.

V. PRIORITY ASSESSMENT

01 PRIORITY FOR INSPECTION (Check one. If high or medium is checked, complete Part 2-Waste information and Part 3-Description of Hazardous Conditions and Incidents)
☐ A. HIGH (Inspection required promptly) ☒ B. MEDIUM (Inspection required) ☐ C. LOW (Inspection on time available basis) ☐ D. NONE (No further action needed, complete current disposition form)

VI. INFORMATION AVAILABLE FROM

01 CONTACT Robert Hayton	02 OF (Agency/Organization) NJDEP - HSMA, BEERA		03 TELEPHONE NUMBER (609) 6332219	
04 PERSON RESPONSIBLE FOR ASSESSMENT	05 AGENCY	06 ORGANIZATION M. Pirnie, Inc	07 TELEPHONE NUMBER 201-8450400	08 DATE MONTH DAY YEAR

☐ M.NCT APPLICABLE



POTENTIAL HAZARDOUS WASTE SITE
PRELIMINARY ASSESSMENT

PART 3-DESCRIPTION OF HAZARDOUS CONDITIONS AND INCIDENTS

I. IDENTIFICATION

01 STATE 02 SITE NUMBER
NJ 370

II. HAZARDOUS CONDITIONS AND INCIDENTS

01 ☒ A. GROUNDWATER CONTAMINATION 02 ☐ OBSERVED (DATE: _____) ☒ POTENTIAL ☐ ALLEGED
03 POPULATION POTENTIALLY AFFECTED: _____ 04 NARRATIVE DESCRIPTION

A potential exists from the leaching pit that allegedly was used until 1980.

(Off-Site Reconnaissance)

01 ☒ B. SURFACE WATER CONTAMINATION 02 ☒ OBSERVED (DATE: 2/1980) ☐ POTENTIAL ☐ ALLEGED

03 POPULATION POTENTIALLY AFFECTED: _____ 04 NARRATIVE DESCRIPTION

Jersey City observed RFE discharging wastewater into the Morris Canal.

(Attachment K)

01 ☒ C. CONTAMINATION OF AIR 02 ☒ OBSERVED (DATE: Numerous) ☐ POTENTIAL ☐ ALLEGED

03 POPULATION POTENTIALLY AFFECTED: _____ 04 NARRATIVE DESCRIPTION

RFE has been cited by NJDEP for violation of air emission standards.

(Attachment C,D)

01 ☐ D. FIRE/EXPLOSIVE CONDITIONS 02 ☐ OBSERVED (DATE: _____) ☐ POTENTIAL ☐ ALLEGED

03 POPULATION POTENTIALLY AFFECTED: _____ 04 NARRATIVE DESCRIPTION

01 ☐ E. DIRECT CONTACT 02 ☐ OBSERVED (DATE: _____) ☐ POTENTIAL ☐ ALLEGED

03 POPULATION POTENTIALLY AFFECTED: _____ 04 NARRATIVE DESCRIPTION

01 ☒ F. CONTAMINATION OF SOIL 02 ☐ OBSERVED (DATE: _____) ☒ POTENTIAL ☐ ALLEGED

03 AREA POTENTIALLY AFFECTED: _____ 04 NARRATIVE DESCRIPTION

Jersey City Health Authorities allege that soils contaminated by the old leaching pit were never removed.

(Attachment K, Off-Site Recon.)

01 ☐ G. DRINKING WATER CONTAMINATION 02 ☐ OBSERVED (DATE: _____) ☐ POTENTIAL ☐ ALLEGED

03 POPULATION POTENTIALLY AFFECTED: _____ 04 NARRATIVE DESCRIPTION

01 ☒ H. WORKER EXPOSURE/INJURY 02 ☐ OBSERVED (DATE: _____) ☒ POTENTIAL ☐ ALLEGED

03 WORKERS POTENTIALLY AFFECTED: _____ 04 NARRATIVE DESCRIPTION

A potential exists from the nature of their processes.

01 ☐ I. POPULATION EXPOSURE/INJURY 02 ☐ OBSERVED (DATE: _____) ☐ POTENTIAL ☐ ALLEGED

03 POPULATION POTENTIALLY AFFECTED: _____ 04 NARRATIVE DESCRIPTION



POTENTIAL HAZARDOUS WASTE SITE
PRELIMINARY ASSESSMENT

PART 3 - DESCRIPTION OF HAZARDOUS CONDITIONS AND INCIDENTS

I. IDENTIFICATION

01 STATE 02 SITE NUMBER
661 370

II. HAZARDOUS CONDITIONS AND INCIDENTS (Continued)

01 ☐ J. DAMAGE TO FLORA

02 ☐ OBSERVED (DATE: _____)

☐ POTENTIAL

☐ ALLEGED

04 NARRATIVE DESCRIPTION

01 ☐ K. DAMAGE TO FAUNA

02 ☐ OBSERVED (DATE: _____)

☐ POTENTIAL

☐ ALLEGED

04 NARRATIVE DESCRIPTION (Include name(s) of species)

01 ☐ L. CONTAMINATION OF FOOD CHAIN

02 ☐ OBSERVED (DATE: _____)

☐ POTENTIAL

☐ ALLEGED

04 NARRATIVE DESCRIPTION

01 ☒ M. UNSTABLE CONTAINMENT OF WASTES
(Spills/runoff/standing liquids/leaking drums)

02 ☐ OBSERVED (DATE: _____)

☒ POTENTIAL

☐ ALLEGED

03 POPULATION POTENTIALLY AFFECTED: _____

04 NARRATIVE DESCRIPTION

The former leaching pit was unlined potentially allowing contaminants to escape. (Off-Site-Reconnaissance)

01 ☐ N. DAMAGE TO OFFSITE PROPERTY

02 ☐ OBSERVED (DATE: _____)

☐ POTENTIAL

☐ ALLEGED

04 NARRATIVE DESCRIPTION

01 ☐ O. CONTAMINATION OF SEWERS, STORM DRAINS, WWTPs

02 ☐ OBSERVED (DATE: _____)

☐ POTENTIAL

☐ ALLEGED

04 NARRATIVE DESCRIPTION

01 ☐ P. ILLEGAL/UNAUTHORIZED DUMPING

02 ☐ OBSERVED (DATE: _____)

☐ POTENTIAL

☐ ALLEGED

04 NARRATIVE DESCRIPTION

05 DESCRIPTION OF ANY OTHER KNOWN, POTENTIAL, OR ALLEGED HAZARDS

III. TOTAL POPULATION POTENTIALLY AFFECTED: _____

IV. COMMENTS

NJDEP and RFE are currently involved with preparing a RCRA Part B permit.

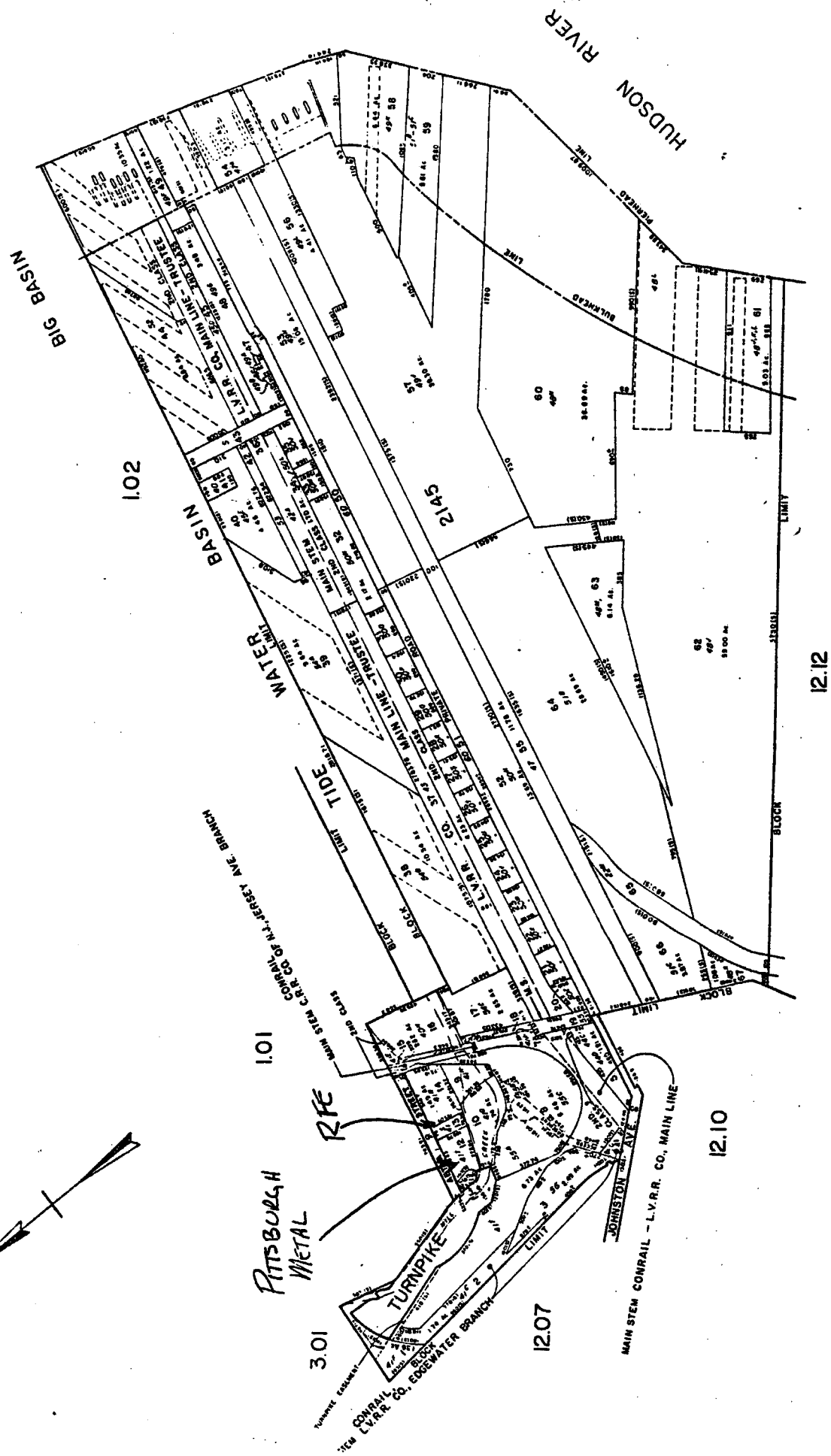
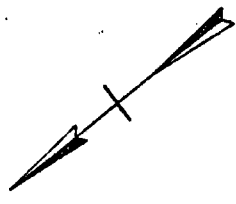
V. SOURCES OF INFORMATION (Cite specific references, e.g. state files, sample analysis, reports)

NJDEP/DWM, DWR, Env.Qual Files: Attachments A - K, L
Hudson Regional Health: Attachment K



QUAD Jersey City
SITE RFE INDUSTRIES
LAT 40°42'45" LONG 74°03'12"

TAX MAP





ATTACHMENT A-1

State of New Jersey

CERTIFIED MAIL
#P258 572 758

DEPARTMENT OF ENVIRONMENTAL PROTECTION
DIVISION OF WASTE MANAGEMENT
32 E. Hanover St., CN 027, Trenton, N.J. 08625

JACK STANTON
DIRECTOR

July 29, 1983

LINO F. PEREIRA
DEPUTY DIRECTOR

Mr. John M. Lukacs, Jr.
Director of Technology
RFE Industries, Inc.
Foot of Jersey Avenue
Jersey City, New Jersey 07302

RE: Hazardous Waste TSD Status of:
RFE Industries, Inc. - EPA ID NO. NJD055090815

Dear Mr. Lukacs:

The Bureau of Hazardous Waste Engineering has reviewed your company's response to the Notice of Violation, Failure to Submit Annual Report. Based on this response and telephone conversations with members of my staff (Mr. Ernest Kuhlwein on 3/9/83 and Mr. Benjamin Esterman On 6/28/83), the Bureau has determined the operating status of the above referenced facility with respect to N.J.A.C. 7:26-1 et seq., the New Jersey Hazardous Waste Management Regulations, to be as follows:

RFE Industries, Inc. hazardous waste treatment, storage or disposal facility as delineated in the company's RCRA Part A application and identified by the following EPA ID Number:

EPA ID NO. NJD055090815

is not excluded from regulation under N.J.A.C. 7:26-1 et seq. because it includes the activity S02-storage in tanks. The NJDEP hazardous waste regulations (N.J.A.C. 7:26-7 et seq.) do not provide for a generator's accumulation of wastes for less than 90 days in tanks, as is exempt from EPA regulations. The exclusion for accumulation of hazardous waste for 90 days or less under N.J.A.C. 7:26-9.3 extends only to storage in containers. This exclusion does not include storage in tanks.

Mr. John M. Lukacs, Jr.

-2-

July 29, 1983

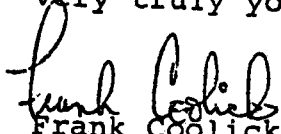
Therefore, your facility should conform with the interim operating requirements of N.J.A.C. 7:26-1 et seq. for "existing facilities" which would include the TSD facility annual report.

Requirements for inclusion in the annual report for a TSD facility are pursuant to N.J.A.C. 7:26-7.6(f)2. This office will allow a 30 day extension from the date of this letter for submission of the required annual report.

Enclosed you will find a copy of the "Wording of Instruments" which you may utilize in meeting the financial requirements for Closure, Post-Closure and Liability (for claims arising from the operations) of your facility pursuant to N.J.A.C. 7:26-9.10 to 9.14. However, all references in these instruments to EPA or EPA Regional Administrator should be changed to read NJDEP or Commissioner, NJDEP.

If you have any questions on this matters, please call Mr. Esterman at (609) 984-4061.

Very truly yours,


Frank Coolick, Chief
Bureau of Hazardous
Waste Engineering

FC:BE:jb

Attachment

c: Dave Shotwell
NJDEP-DWM

Joel Golumbek
USEPA-Region II



RC-FAC

ATTACHMENT 8-1

State of New Jersey
DEPARTMENT OF ENVIRONMENTAL PROTECTION

DIVISION OF WASTE MANAGEMENT
32 E. Hanover St., CN 028, Trenton, N.J. 08625

DR. MARWAN M. SADAT, P.E.
DIRECTOR

RICHARD C. SALKIE, P.E.
ASSOCIATE DIRECTOR

- 8 APR 1986

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

John M. Lukacs, Jr.
Director of Technology
RFE Industries, Inc.
Foot of Jersey Avenue
Jersey City, NJ 07302

Dear Mr. Lukacs:

RE: RFE Industries, Inc., Jersey City, EPA ID No. NJD 055 090 815

The Solid Waste Management Act (N.J.S.A. 13:1E-1 et seq.) authorized the New Jersey Department of Environmental Protection (NJDEP) to establish a program requiring permits for hazardous waste treatment, storage or disposal facilities. NJDEP has issued regulations to implement this permit program, which can be found under N.J.A.C. 7:26-1.1 et seq.

Pursuant to these regulations, specifically N.J.A.C. 7:26-12.3, your facility has been operating as an existing facility since the New Jersey Hazardous Waste Management Regulations (N.J.A.C. 7:26-1.1 et seq.) became effective on October 8, 1981. Our records show that you have submitted either Part A of the USEPA RCRA Permit Application or Part A of the New Jersey Hazardous Waste Facility Permit Application. If necessary, your Part A application shall be revised to reflect the requirements of N.J.A.C. 7:26 1.1 et seq. Forms may be obtained from this office or U.S.E.P.A. Region II at (212) 264-9880.

This letter shall constitute an official request for the complete New Jersey Hazardous Waste Facility Permit Application, which shall include items set forth in Attachment I. Please note that Item 7 requires the submittal of information pursuant to the Hazardous and Solid Waste Amendments of 1984 (HSWA). The State of New Jersey is not yet authorized to administer the provisions in HSWA, therefore the attached letter shall constitute EPA's request for the HSWA portion of the permit application. Your permit application should be prepared to both the HSWA and pre-HSWA requirements.

Your alternative information statement and affidavit should be submitted no later than three (3) months from the date of this letter. The remaining sections of your application should be submitted no later

- 8 APR 1986

ATTACHMENT

B-2

the required application by this date shall constitute grounds for termination of existing facility status pursuant to N.J.A.C. 7:26-12.3(f)2.

As stated above, your full application is not due until six (6) months from the date of this letter. However, I would encourage you to start work on it as early as possible because there is a significant amount of information to be submitted. Initially, all applicants shall submit three (3) copies of the application. Two copies shall be submitted to:

Frank Coolick, Chief
Bureau of Hazardous Waste Engineering
Division of Waste Management
New Jersey Department of Environmental Protection
8 East Hanover Street
Trenton, NJ 08625

The remaining copy shall be submitted to:

Barry Tornick Chief
New Jersey/Caribbean Permit Section
U.S. Environmental Protection Agency
Region II (2AWM-SW)
26 Federal Plaza
New York, NY 10278

The Department will notify the applicant as to how many additional copies are needed for distribution to appropriate state and local authorities when it completes its initial evaluation of the application.

Should you wish to treat part of your application as confidential information, please refer to Attachment II, which outlines the procedures to be followed in making this claim.

I have taken the liberty of scheduling two (2) application conferences in order to assist you in preparing this application. These conferences have been scheduled for June 18, 1986 and August 19, 1986 at 10:00 am. These conferences will be held in the conference room, 8 East Hanover Street, Trenton, New Jersey 08625. If it is determined that one or both of these conferences is unnecessary, please notify my office of the cancellation.

- 8 APR 1986

Should you have any questions regarding this official request to submit your Hazardous Waste Facility Permit Application, please do not hesitate to contact me at (609) 984-6724 or the Bureau of Hazardous Waste Engineering at (609) 984-4892.

Very truly yours,



Edward J. Londres, P.E.
Assistant Director
Engineering

EP5:vb

Attachments

c: Angel Chang, USEPA

**STATE OF NEW JERSEY
DEPARTMENT OF ENVIRONMENTAL PROTECTION
DIVISION OF WASTE MANAGEMENT
32 EAST HANOVER STREET
CN 027
TRENTON, NEW JERSEY 08625**

ANNUAL FACILITY HAZARDOUS WASTE REPORT

Calendar Year Ending December 31, 1982

Prepared for

**RFE INDUSTRIES, INC.
Foot of Jersey Avenue
Jersey City, New Jersey 07302**

EPA ID No: NJ D055080815

Prepared by

**WEHRAN ENGINEERING CORPORATION
666 East Main Street
Middletown, New York 10940**

Name: RFE Industries, Inc.
Address: Foot of Jersey Avenue
Jersey City, N.J. 07302
Contact: John Lukacs, Director of Technology
Phone: 201-451-0229
Report Period: January 1, 1982 to December 31, 1982
Manifest Summary: See Attached Table 1
Closure Cost Estimate: \$10,000 (1982 Estimate)
Post Closure: N.A.

CERTIFICATION

I certify that under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based upon my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties under N.J.S.A. 7:1E-1 et seq. for submitting false information, including the possibility of fine and imprisonment.

Name: John Lukacs
Title: Director of Technology
Signature: *John Lukacs*
Date: 8-29-83

TABLE 1
MANIFEST SUMMARY

<u>Manifest Number</u>	<u>Date</u>	<u>Waste</u>	<u>Quantity (Gal)</u>	<u>EPA No.</u>
0077355	1-22-82	Corrosive Liquid N.O.S.	2500	D002
0089174	1-28-82	Corrosive Liquid N.O.S.	2600	F009
0060755	2-19-82	Acid Liquid N.O.S.	2222	D002
0089173	3-8-82	Corrosive Liquid N.O.S.	2800	F009
0077412	3-12-82	Corrosive Liquid N.O.S.	2457	D002
0077439	3-30-82	Corrosive Liquid N.O.S.	2820	D002
0077413	3-31-82	Corrosive Liquid N.O.S.	3000	F009
0077411	4-21-82	Corrosive Liquid N.O.S.	2693	D002
0077410	5-12-82	Corrosive Liquid N.O.S.	2870	D002
0077440	5-14-82	Waste Potassium Cyanide	3300	F015
0077414	5-26-82	Corrosive Liquid N.O.S.	2840	D002
0077415	6-11-82	Corrosive Liquid N.O.S.	2782	D002
0077517	6-29-82	Waste Potassium Cyanide	3504	F015
0077436	7-7-82	Corrosive Liquid N.O.S.	2900	D002
0070861	8-4-82	Corrosive Liquid N.O.S.	2072	D002
0077498	8-20-82	Corrosive Liquid N.O.S.	2400	D002
0077519	8-26-82	Waste Potassium Cyanide	3300	F015
0077558	9-17-82	Corrosive Liquid N.O.S.	2438	D002
0062392	9-30-82	Corrosive Liquid N.O.S.	2600	D002
0062391	10-6-82	Waste Potassium Cyanide	3270	F015
0077574	10-14-82	Corrosive Liquid N.O.S.	2950	D002
0062386	11-3-82	Corrosive Liquid N.O.S.	2800	D002
0077599	11-24-82	Cyanide Soln. N.O.S.	3270	F015
0077538	11-29-82	Waste Acid N.O.S.	3000	D002
0077608	12-27-82	Waste Acid N.O.S.	2800	D002

NEW JERSEY DEPARTMENT OF ENVIRONMENTAL PROTECTION
HAZARDOUS WASTE FACILITY ANNUAL REPORT - PART I

ATTACHMENT

B-2

1. CALENDAR YEAR COVERED 1983
2. FACILITY'S NAME RFE Industries, Inc.
3. EPA ID NO. NJD 055080815
4. MAILING ADDRESS Foot of Jersey Ave.
Jersey City, New Jersey 07302
5. STREET ADDRESS OF FACILITY Foot of Jersey Avenue
Jersey City, New Jersey 07302
6. FACILITY CONTACT John Lukacs PHONE NUMBER (201) 451-0229
7. CLOSURE COST ESTIMATE \$ 10,000
8. POST-CLOSURE COST ESTIMATE (if applicable) \$ N.A.
9. CERTIFICATION STATEMENT

"I certify under penalty of law that I have personally examined and am familiar with the information submitted in this document and all attachments and that, based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the information is true, accurate, and complete. I am aware that there are significant penalties under N.J.S.A. 13:1E-1 et seq. for submitting false information, including the possibility of fine and imprisonment".

JACK Leinen
Print or Type Name

Jack Leinen
Signature

2/24/84
Date

10. In addition to the information required above and that required in Part II of this report, please submit the following required items: (where applicable)
 - A. A copy of the facility's typical waste analysis form.
 - B. A copy of the facility's typical daily inspection form.
 - C. A copy of the typical notice to a generator, required under N.J.A.C. 7:26-9.4(a)1 and a listing of all generators who received this notice (only for commercial facilities).
 - D. A listing of all waste shipments rejected, according to manifest number and an explanation for each rejected shipment (only for commercial facilities).
 - E. A listing of all manifest discrepancies and an explanation of each discrepancy (only for commercial facilities).
 - F. A listing of the total quantity of each waste type treated, stored, or disposed of at the facility. This listing shall include all hazardous waste accepted at the hazardous waste facility, including all on-site generated hazardous waste.
 - G. A listing of the total quantities of each waste type consigned to each treatment, storage, or disposal process used at the facility. This listing shall include all hazardous waste accepted at the hazardous waste facility, including all on-site generated hazardous waste.
 - H. A report covering all incidents that required implementing the contingency plan.

NEW JERSEY DEPARTMENT OF ENVIRONMENTAL PROTECTION
HAZARDOUS WASTE FACILITY ANNUAL REPORT - PART II

ATTACHMENT

B-8

11. FACILITY EPA ID # NJD 055080815
12. GENERATOR NAME On-site
13. GENERATOR ADDRESS Same as Facility
14. GENERATOR EPA ID # Same as Facility
- =====

15. WASTE IDENTIFICATION

LINE NUMBER	a) DESCRIPTION OF WASTE	b) NJDEP HAZARDOUS WASTE NUMBER	c) HANDLING METHOD	d) AMOUNT OF WASTE	e) UNITS
1.	Waste Acid N.O.S.	D008,009,002	SO ₂	280.2	T
2.	Waste Cyanide Solution	D003,F015	SO ₂	106.1	T

SEE ATTACHED GENERATOR SHEETS FOR ADDITIONAL DETAILS

Waste Analysis Plan

The two waste types generated at the RFE Industries, Inc. facility are tested annually for the following parameters.

Acid Wastes

corrosivity
specific gravity

Cyanide Wastes

corrosivity
% cyanides
specific gravity

<u>Waste Type</u>	<u>Parameter</u>	<u>Sample Type</u>	<u>Method</u>
Acid	corrosivity	Grab	SW846
Acid	specific gravity	Grab	Standard Methods 210
Cyanide	corrosivity	Grab	SW846
Cyanide	% cyanide	Grab	Standard Methods 413
Cyanide	specific gravity	Grab	Standard Methods 210

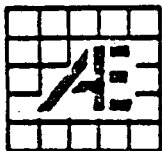


Ambient Engineering Inc.

I N S P E C T I O N P O I N T S

RFE INDUSTRIES, INC.
Jersey City Plant
Jersey City, NJ

40 CFR 265.15



Ambient Engineering Inc.

ATTACHMENT

B-11

INSPECTION POINTS: The inspection will consist of a tour through the facility. Visual checks will be made of the following areas. Any abnormalities will be checked, reported and corrected.

- | | |
|---------------------------------------|---|
| 1) Production Office & Samples Closet | Check on housekeeping & small sample closet for leaks etc. |
| 2) Toilet Facilities | Oil burner leaks & cleaners. |
| 3) Melt Area | Check material storage; review gas & oil lines. |
| 4) Strip Area | Check for leaky tanks; waste lines; leaky drums in storage. |
| 5) CN Room & SO ₂ Area | Check for leaking tanks & broken lines. |
| 6) Scrubber Room | Check for leaking tank & broken lines. |
| 7) Tin Melt Shop Room | Check recirculation tank & material stored. |
| 8) Solder Room | Check for oil leaks & material storage. |
| 9) Dross Pot Area | Review for leaky drums, housekeeping etc. |
| 10) Casting Room | Review for leaks. |
| 11) Building-Rear | Check for leaking tanks, dike condition, & drum conditions. |
| 12) Dust Collector #1 | Dust hopper slides to be closed.
Dust barrel capped. |
| 13) Dust Collector #2 | Dust hopper slides to be closed.
Dust barrel capped. |
| 14) Boiler Room | Check for leaky oil lines. |
| 15) Warehouse #1 | Interior & Exterior - Check for leaky tanks, make sure all drums are properly stored. |
| 16) Warehouse #2 | Interior & Exterior - Check for leaky tanks, make sure all drums are properly stored. |
| 17) <u>Other:</u> | <hr/> |

NEW JERSEY DEPARTMENT OF ENVIRONMENTAL PROTECTION
BUREAU OF HAZARDOUS WASTE
GENERATOR'S ANNUAL REPORT
FOR YEAR OF 1983

Page # 1 of 1

1. GENERATOR'S NAME RFE Industries, Inc. 2. EPA ID NO. NJD 055080815
3. ADDRESS Foot of Jersey Ave., Jersey City TELEPHONE (201) 451-0229
4. TRANSPORTER'S NAME SCA Chemical Services 5. EPA ID NO NJD 089216790
5. ADDRESS 100 Lister Avenue, Newark, New Jersey
7. FACILITY'S NAME SCA Chemical Company 8. EPA ID NO NJD 089216790
9. ADDRESS 100 Lister Ave., Newark, NJ 07105

10. MANIFEST NO	DESCRIPTION OF WASTE	DOT HAZ. CLASS	QUANTITY	UNITS	EPA WASTE TYPE	REJECTED
0077539	Waste Acid N.O.S.	Corrosive	2800	Gal.	D002,008,009	
0077675	" " "	"	3000	"	" " "	
0140077	Waste Cyanide Sol. N.O.S.	Poison B	3000	"	D003,F015	
0077629	" " " "	" "	3300	"	" "	
0077503	" " " "	" "	3000	"	" "	
0077635	" " " "	" "	3000	"	" "	
0077625	Waste Acid N.O.S.	Corrosive	2700	"	D002,008,009	
0140072	Waste Acid N.O.S.	Corrosive	3000	"	" " "	
0077596	" " "	"	3000	"	" " "	
0077604	" " "	"	3000	"	" " "	
0077631	" " "	"	3000	"	" " "	
0077595	" " "	"	2500	"	" " "	
0077628	" " "	"	2500	"	" " "	
0118239	" " "	"	3000	"	" " "	
0077675	" " "	"	3000	"	" " "	

* - PLACE AN "*" UNDER THE REJECTED COLUMN FOR THOSE MANIFESTS REJECTED BY FACILITY.

ATTACHMENT 8-12

NEW JERSEY DEPARTMENT OF ENVIRONMENTAL PROTECTION
BUREAU OF HAZARDOUS WASTE
GENERATOR'S ANNUAL REPORT
FOR YEAR OF 1983

1. GENERATOR'S NAME RFE Industries, Inc. 2. EPA ID NO. NJD 055080815
3. ADDRESS Foot of Jersey Ave., Jersey City TELEPHONE (201) 451-0229
4. TRANSPORTER'S NAME Hisko Trucking 5. EPA ID NO NJD 060784493
5. ADDRESS 26 Buckingham Road, Perth Amboy, New Jersey
7. FACILITY'S NAME SCA Chemical Company 8. EPA ID NO NJD 089216790
9. ADDRESS 100 Lister Ave., Newark, NJ 07105

10. MANIFEST NO	DESCRIPTION OF WASTE	DOT HAZ.CLASS	QUANTITY	UNITS	EPA WASTE TYPE	REJECTED
0077602	Waste Acid N.O.S.	Corrosive	3000	Gal.	D008,009,002	
0077488	" " "	"	3000	"	" " "	
0011764	" " "	"	2800	"	" " "	
0011763	" " "	"	3000	"	" " "	
0077487	" " "	"	2500	"	" " "	
0176916	" " "	"	3000	"	" " "	
0077634	" " "	"	3000	"	" " "	
0176901	" " "	"	3000	"	" " "	
0176889	" " "	"	3000	"	" " "	
0176939	" " "	"	2800	"	" " "	
0077586	Waste Cyanide Sol. N.O.S. Poison B		2000	"	" D003, F015	
0170214	" " " " " "	" "	3000	"	" " "	
0077685	" " " " " "	" "	3500	"	" " "	
0020305	" " " " " "	" "	3000	"	" " "	

* - PLACE AN "*" UNDER THE REJECTED COLUMN FOR THOSE MANIFESTS REJECTED BY FACILITY.

RECEIVED
B-13

ATTACHMENT C-3

HUDSON REGIONAL HEALTH COMMISSION

313 HARRISON AVENUE
HARRISON, NEW JERSEY 07029

(201) 485-7001

ORDER

(201) 485-7002

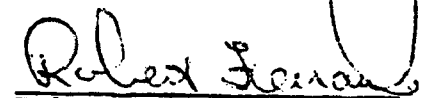
RFE INDUSTRIES
Foot of Jersey Avenue
Jersey City, New Jersey 07302

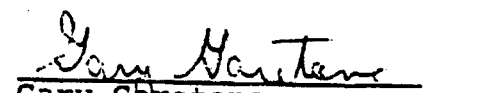
Attn: Bill Shaw,

WHEREAS: THE HUDSON REGIONAL HEALTH COMMISSION has determined by investigation and inspection made on March 15, 1983, that you did cause, suffer, allow, or permit particle emissions to be emitted into the outdoor air in excess of 20% opacity from the large baghouse, on premises known as RFE Industries, Ft. of Jersey Ave., Jersey City, N.J., 07302, this in violation of Section 6:1 of AN ORDINANCE ESTABLISHING AN AIR POLLUTION CONTROL CODE.

NOW THEREFORE, YOU ARE HEREBY ORDERED TO CEASE causing, suffering, allowing, or permitting the emission in violation of said code.

Failure to comply with this order will result in court action.


Robert Ferraiuolo,
Director


Gary Garetano,
Environmental Specialist

cc: Health Dept.

Dated: March 17, 1983



ATTACHMENT D

State of New Jersey
DEPARTMENT OF ENVIRONMENTAL PROTECTION
DIVISION OF ENVIRONMENTAL QUALITY
JOHN FITCH PLAZA, CN027, TRENTON, N.J. 08625

ORDER

TO: R.F.E. Industries, Inc.
Bertram James Barron, Plt. Mgr.
Foot of Jersey Avenue
Jersey City, New Jersey 07302

RE: N.J.A.C. 7:27-6.2(d)
Plant ID #10348
Violation Occurred on
Premises Known As:

Foot of Jersey Street, Jersey
City, Lot 41T, Block 2145, Hudson
County, New Jersey

WHEREAS, the State Department of Environmental Protection has determined by investigation(s) made pursuant to the Provisions of the New Jersey Air Pollution Control Act that on October 27, 1982 you did violate Title 7, Chapter 27, Subchapter 6, Section 6.2(d), of the New Jersey Administrative Code.

The investigation(s) disclosed particles the shade or appearance of which was greater than 20 percent opacity being emitted into the outdoor air from the baghouse venting dross furnace on the premises identified above.

NOW, THEREFORE, YOU ARE HEREBY ORDERED, to cease violation(s) of said Subchapter on the premises owned, leased, operated or maintained by you on or before December 18, 1982.

DATED December 3, 1982

Thomas A. Pluta
Thomas A. Pluta, Assistant Director
Enforcement Branch.

cc: Hudson Regional Health Comm.
Newark Field Office

LOG # 20048

CERTIFIED MAIL

Memo

To: T. Leonard

From: J. Walsh

8-5-81

Subject: RFE Industries - Consent Order Compliance

Observation: I was inspecting Lignum Clem Works next to RFE and noticed there were no visible emissions from RFE. I stopped over and saw Bill Shaw. He took me on a tour of the plant. The large B.H. is completely installed & 3 Furnaces were in operation at the time. A large amount of smoke was being collected by the Hoods over the Furnaces. No emissions at all from the BH Stack. The small B.H. was completely installed except for some final electrical work that was being done. This should be in operation by the end of the day. The large B.H. has been operating for 2 days.

Solder Refining Pot to Small B.H. will not be put into operation until Small B.H. is fully operational.

Scrubber ^{+ Equip.} Not yet in operation.

Conclusion: Company in full compliance with Consent Order as of 8-6-81

Recommendation: File. Recommend 5 yr. ext. for Small & Large B.H. Ext. Scrubber.

HUDSON REGIONAL HEALTH COMMISSION

313 HARRISON AVENUE
HARRISON, N.J. 07029

RECEIVED

MAY 22 1986

REPORT

MALCOLM PIRNIE, INC.
PARAMUS, N.J.

REPORT OF FIELD INVESTIGATION

DATE 12-4-80 TIME FILE#
REFERENCE TO CHAPTER

FULL BUSINESS NAME Refinery of Electronics

Location Ft. of Jersey Ave., Jersey City, N.J.

No.

Street

Municipality

Mailing Address same

No.

Street

Post Office

Zip Code

Person(s) Interviewed Jack Leiner

President

Title

Title

Comments

Report Requested by Board of Health

Purpose of Investigation Investigate drums of acid and possible waste material
packed in D.E.P. Disposal drumsObservations Drums contain material removed from Perth Amboy site after fire.
Precious metals are contained in these drums and is to be reclaimed.
Fire Department issued summons to company because failure to obtain
proper permits for use, storage and transportation of hazardous
chemicals pursuant to Jersey City Ordinance S-400 and failure to
obtain certificates of occupancy for premises. Case to be heard
1:30 p.m at Jersey City Housing Court. Will meet with Fire ChiefConclusions Shortell and Mr. Leiner to go over permits required by city and
Hudson Regional Health Commission

Recommendations

ATTACHMENT F-1

Investigated by Gregory Olds

Signed

Title

HUDSON REGIONAL HEALTH COMMISSION

313 HARRISON AVENUE
HARRISON, N.J. 07029

RECEIVED

MAY 22 1986

REPORT OF FIELD INVESTIGATION

DATE 2-15-80

TIME

11:35-1:00

FILE#

MALCOLM PIRNIE, INC.

REFERENCE TO CHAPTER PARAMUS, N.J.

Refinery for Electronics (Aetna Smelting)

FILL BUSINESS NAME

Ft. of Jersey Ave., Jersey City, N.J.

Location

No. same

Street

Municipality

Mailing Address

No.

Street

Post Office

Zip Code

Person(s) Interviewed

Mr. Linares

Owner of Company

Title

Ken Brophy / Fire Chief Shortell

Title

Comments

Report Requested by

Ken Brophy - Jersey City Board of Health

Title

Purpose of Investigation

Illegal dumping in tributary of river

Observations

PVC pipe leading from nalgen container to river, with yellowish material inside it. Cooling water from smelting operation allowed to run off on ground through mound of yellow, plastel like material. This material is being leached into water and draining through a buried pipe out to river also. Samples of material from mound and container taken for analysis by fire chief. Fire Department issued violation notice for housekeeping. Coast Guard informed of dumping and asked to take water samples. Will follow up with DEP toxic substances division or Water Quality Bureau.

Conclusions

Recommendations

ATTACHMENT F2

Investigated by Greg Olds, Gary Garetano

Signed

DEPARTMENT OF FIRE & SAFETY SERVICES

DIVISION OF FIRE

JERSEY CITY, N.J.

Subject.....Ft. Jersey Avenue

February 19, 1980

19.....

John T. Mullins
Chief of Department

Sir:

On Friday, February 15, 1980. Fire Prevention rechecked the area at the foot of Jersey Avenue and Aetna Street. Firefighters Thomaier, Campbell and myself discovered what appeared to be a pipe connected to a processing tank dumping into the (big basin) channel leading to the Hudson River.

There were also drums, which had previously contained hazardous materials according to the markings: i.e.: potassium cyanide, corrosives, oxidizers. I then had Firefighter Thomaier take photographs of the area. The situation appeared serious enough to notify yourself and the Director which I did by phone. Also notified and responding were Dr. Brophy, Board of Health and Gregory Olds, Hudson Regional Health Council.

We requested details of the processing from Mr. J. Leiner, owner and also from the forman & controller. All stated they did not know what material was being poured into the river. There was also drainage from the building leaching material into the river. We notified the D. E. P., the Attorney General's Office and the U. S. Coast Guard.

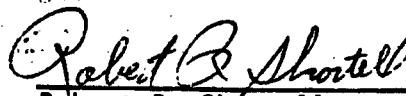
A summons was issued to Mr. Leiner and he appeared before Judge Davis. He was told to clean up the area under the supervision of Fire Prevention and return to court on Thursday, February 21, 1980 with his lawyer.

Before court a meeting was held in the judges chambers with Attorney General's representatives Flannagan & Smith, Judge Davis, Prosecutor Cubberly and myself. It was determined at the meeting to proceed with the fire complaint and forward records to the Attorney General's office for possible action. Samples of material were taken from three areas and photographs were taken by Firefighter Pangborn and Thomaier.

Respectfully,

cc: Director
Dr. Brophy, Board of Health
Greg. Olds, Regional Health

RRS/kjw


Robert R. Shortell
Chief of Fire Prevention

ATTACHMENT F3

Hudson firm admits dumping in river

NEWARK (AP)—A joint state-federal Toxic Waste Task Force notched its first conviction yesterday when a Jersey City company admitted it dumped chemicals into the Hudson River.

The Refinery for Electronics Industries Inc., was fined \$2,500 by U.S. Magistrate William J. Hunt after the company waived grand jury hearings and pleaded guilty to charges filed by the U.S. Attorney's office.

The firm admitted dumping highly alkaline chemical wastes and metals into the river last Feb. 15, according to federal court documents.

The company, which reclaims gold, silver and other precious metals for electroplating, is located on Jersey Avenue in Jersey City.

The Toxic Waste Task Force is comprised of environmentalists, educators, health experts and chemical company executives and investigates where toxic substances are being illegally dumped or stored.

The violation first was noticed by Jersey City Fire Prevention Bureau inspectors while on a routine check, said assistant U.S. Attorney Thomas F. Collins Jr.

They spotted a pipe and notified state environmental officials affiliated with the joint task force, he said.

Federal authorities were unsure how much chemical waste was dumped into the Hudson River or how much it would have cost RFE Industries to dispose of it legally.

U.S. Attorney Robert Del Tufo said cooperation from the Jersey City inspectors, the Hudson County Regional Health Commission and the U.S. Environmental Protection Agency helped the case.

Efforts to curb toxic waste dumping were boosted last April when Rep. James Florio, D-Camden, introduced legislation to begin cleaning up the state's hazardous chemical waste sites. The bill would identify the state's 100 most hazardous sites and empower the EPA to begin containing and cleaning up the sites.

Like many areas, the problem arises because the state is short of safe disposal and treatment facilities to stem the flood of hazardous wastes, and the problem is worsened because of tighter regulations on disposal and ocean dumping, Collins explained.

Hudson Reporter Aug 7, 1980

ATTACHMENT F4



State of New Jersey
DEPARTMENT OF ENVIRONMENTAL PROTECTION

DIVISION OF WASTE MANAGEMENT
32 E. Hanover St., CN 028, Trenton, N.J. 08625

DR. MANWAT AL-SADAT, P.E.
DIRECTOR

March 25, 1986

RICHARD C. SAKIE, P.E.
ASSOCIATE DIRECTOR

RFI 1000
04-86-12
ATTACHMENT G-1

MEMORANDUM

TO: John Skoviak, Chief
Bureau of Compliance and Enforcement

THROUGH: Shirlee Schiffman, Chief
Bureau of Hazardous Waste Planning and Classification

FROM: Kurt Whitford, Environmental Scientist
Bureau of Hazardous Waste Planning and Classification

SUBJECT: Lead Dross Classification

It is the opinion of this Bureau that lead dross is considered to be a waste material and, would therefore be considered a hazardous waste when the dross fails the E.P. toxicity test for leachable lead.

Under New Jersey's current definition of solid waste (N.J.A.C. 7:26-1.6) lead dross would be considered a "manufacturing or mining by-product" as described in N.J.A.C. 7:26-1.6(e). Dross is sometimes discarded as described in subsection (c)3 because it is physically and/or chemically treated in lieu of disposal. Manufacturing or mining by-products which are sometimes discarded are considered to be solid wastes, therefore making dross solid waste.

EPA has considered this type of material to be solid waste also. In the May 19, 1980 codification of RCRA (45 FR 33090) EPA recognized that reclamation of these types of materials should be subject to solid waste, and if applicable, hazardous waste regulation. The Agency reaffirmed their position in the January 4, 1985 amended definition of solid waste (50 FR 614) by stating that "by-products are materials, generally of a residual character, that are not produced intentionally or separately, and that are unfit for end use without substantial processing. Examples are still bottoms, reactor cleanout materials, slags, and drosses."

ATTACHMENT G-2

Since lead dross is considered solid waste, the next determination is whether the waste is hazardous in accordance with New Jersey's regulations. Of primary concern would be whether dross fails the E.P. toxicity test for leachable lead. Previous testing of dross has shown it to fail the E.P. toxicity characteristic in some cases. Dross should be tested and, if found to leach lead in excess of 5.0 mg/l, should be classified as hazardous waste.

When DEP amends its definition of solid waste later this year, dross will continue to be considered solid waste, and therefore potentially hazardous waste.

If you have any questions, please call me at 2-6862.

PRC:bag

NOTICE OF VIOLATION

ATTACHMENT 1

ID NO. NJD055090815 DATE 5-22-1985
NAME OF FACILITY RFE INDUSTRIES
LOCATION OF FACILITY FOOT OF JERSEY AVE. JERSEY CITY, N.J. 07310
NAME OF OPERATOR JOHN LUNDS DIRECTOR OF TECHNOLOGY

You are hereby NOTIFIED that during my inspection of your facility on the above date, the following violation(s) of the Solid Waste Management Act, (N.J.S.A. 13:1E-1 et seq.) and Regulations (N.J.A.C. 7:26-1 et seq.) promulgated thereunder and/or the Spill Compensation and Control Act, (N.J.S.A. 58:10-23.11 et seq.) and Regulations (N.J.A.C. 7:1E-1 et seq.) promulgated thereunder were observed. These violation(s) have been recorded as part of the permanent enforcement history of your facility.

DESCRIPTION OF VIOLATION 7:26-7.2(a) FAILING TO PROPERLY LABEL
HAZARDOUS WASTE CONTAINERS
7:26-7.2(c) ACCEPTING CONTAINERS NOT PROPERLY LABELED & MARKED
7:26-7.3(a) SHIPMENTS OF HAZARDOUS WASTE NOT MANIFESTED
7:26-7.6(a) ACCEPTING HAZ. WASTE SHIPMENTS NOT PROPERLY LABELED & MARKED
7:26-7.6(b) ACCEPTING HAZ. WASTE AT AN UNAUTHORIZED FACILITY
7:26-9.3(a) IMPROPER STORAGE OF HAZARDOUS WASTE
7:26-12.1(a) OPERATING A FACILITY W/O AN APPROVED TREATMENT

Remedial action to correct these violations must be initiated immediately and be completed by

5/29/85. Within fifteen (15) days of receipt of this Notice of Violation, you shall submit in writing, to the investigator issuing this notice at the above address, the corrective measures you have taken to attain compliance. The issuance of this document serves as notice to you that a violation has occurred and does not preclude the State of New Jersey, or any of its agencies from initiating further administrative or legal action, or from assessing penalties, with respect to this or other violations. Violations of these regulations are punishable by penalties of \$25,000 per violation.

Investigator, Division of Waste Management
Department of Environmental Protection



ATTACHMENT J

State of New Jersey

DEPARTMENT OF ENVIRONMENTAL PROTECTION

DIVISION OF WASTE MANAGEMENT

32 E. Hanover St., CN 027, Trenton, N.J. 08625

JACK STANTON
DIRECTOR

LINO F. PEREIRA
DEPUTY DIRECTOR

RFE Industries, Inc.
John Lukacs
Foot of Jersey Avenue
Jersey City, NJ 07302

RE: NOTICE OF VIOLATION
FAILURE TO SUBMIT ANNUAL REPORT

Dear Mr. Lukacs:

As a result of the information included in your company's RCRA Part A submittal to the USEPA, Region II, your hazardous waste activities were classified as a TSD (Treatment, Storage or Disposal) facility status. Pursuant to the provisions of the New Jersey Solid Waste Management Act, N.J.S.A. 13:1E-1, et seq., the Department of Environmental Protection has determined by examination of our files that you failed to submit a TSD Facility Annual Report by March 1, 1982. The requirements of this report are given on the enclosed sheet (along with instructions on how to be delisted from TSD status). Please note that this report is different and separate from the Generator's Report referred to in N.J.A.C. 7:26-7.4(g).

NOW, THEREFORE, YOU ARE HEREBY NOTIFIED that your facility shall submit the required annual report within fifteen (15) days of receipt of this Notice to: Frank Coolick, Chief, Bureau of Hazardous Waste Engineering, 32 East Hanover Street, Trenton, New Jersey 08625.

BE ON NOTICE that the Solid Waste Management Act establishes penalties of up to \$25,000 per day for violation of the Department's hazardous waste management regulations. Your failure to correct the above violation, or any future violation, may result in a penalty action by this Department. Failure to submit the required report by the specified date will result in daily fines as follows:

- i. During the first week after the deadline: \$100/day
- ii. During the second week after the deadline: \$200/day
- iii. During the third week after the deadline: \$500/day
- iv. During the fourth week after the deadline
and subsequently: a maximum of \$25,000/day

If you have any questions regarding this Notice, please call the Bureau of Hazardous Waste Engineering at (609) 292-9880.

DATE: JAN 10 1983


David J. Shotwell, Chief

Bureau of Compliance and Enforcement

DJS:rh
Enclosure

New Jersey Is An Equal Opportunity Employer

MALCOLM
PIRNIE

ATTACHMENT K

TELEPHONE CALL CONFIRMATION

Local 81/485-7001 Long Distance _____ Date 5-15-86
To/From Gary Gortano Time 11:45
Hudson Regional Health Project PA
MPI Name Meryl MASTERS - ALEXANDER Proj. No. 835-08-1100
Subject: RFE Industries

- They have been cited for dumping into the canal. There was a PVC pipe leading into the canal on Feb 15, 1980. They were fined \$2500 and were prosecuted by the Attorney General's office.
- They also have general air emission problems.

Route to:

File:

RCRA TREATMENT, STORAGE AND DISPOSAL FACILITY INSPECTION FORM
FOR TSD FACILITIES ONLY

ATTACHMENT L-1

COMPANY NAME: RFE INDUSTRIES

EPA I.D. Number: NJDA55090815

COMPANY ADDRESS: FOOT OF JERSEY AVE., JERSEY CITY

COMPANY CONTACT OR OFFICIAL:

John LUCAS

OTHER ENVIRONMENTAL PERMITS HELD

BY FACILITY: ☐ NPDES

☐ AIR

☐ OTHER

TITLE: Plt. mgr.

INSPECTOR'S NAME: Andrew Bellina

DATE OF INSPECTION: 11-19-81

BRANCH/ORGANIZATION:

SWB / EPA

TIME OF DAY INSPECTION TOOK PLACE:

1:30 P.M.

(1) Is there reason to believe that the facility has hazardous waste on site?

a. If yes, what leads you to believe it is hazardous waste?
Check appropriate box:

☒ Company admits that its waste is hazardous during the inspection.

☒ Company admitted the waste is hazardous in its RCRA notification and/or Part A Permit Application.

☐ The waste material is listed in the regulations as a hazardous waste from a nonspecific source (\$261.31)

☐ The waste material is listed in the regulations as a hazardous waste from a specific source (\$261.32)

☐ The material or product is listed in the regulations as a discarded commercial chemical product (\$261.33)

☐ EPA testing has shown characteristics of ignitability, corrosivity, reactivity or extraction procedure toxicity, or has revealed hazardous constituents (please attach analysis report)

☐ Company is unsure but there is reason to believe that waste materials are hazardous. (Explain)

b. Is there reason to believe that there are hazardous wastes on-site which the company claims are merely products or raw materials?

YES

NO

DON'T
KNOW

Please explain:

c. Identify the hazardous wastes that are on-site, and estimate approximate quantities of each.

3,000 gal - D002

3,000 gal - F009

(2) Does the facility generate hazardous waste? ☒

(3) Does the facility transport hazardous waste? ☒ Yes, as Transp., but does not effect to transport any HW.

(4) Does the facility treat, store or dispose of hazardous waste? ☒

YES

NO

DON'T
KNOW

- b. Is there reason to believe that there are hazardous wastes on-site which the company claims are merely products or raw materials?

Please explain:

- c. Identify the hazardous wastes that are on-site, and estimate approximate quantities of each.

F009 - 3,000 gal.

D002 - 3,000 gal.

- d. Describe the activities that result in the generation of hazardous waste.

Refine gold & silver from electronic plating & jewelry scrap. Reclaiming of base metals from the same source. Alloying & mfg. solder.

- (2) Is hazardous waste stored on site?

- a. What is the longest period that it has been accumulated?

6 months

- b. Is the date when drums were placed in storage marked on each drum?

No drums on site

- (3) Has hazardous waste been shipped from this facility since November 19, 1980?

- a. If "yes," approximately how many shipments were made?

18 shipments

- (4) Approximately how many hazardous waste shipments off site have been made since November 19, 1980? *18*

- a. Does it appear from the available information that there is a manifest copy available for each hazardous waste shipment that has been made?

- b. If "no" or "don't know," please elaborate.

ATTACHMENT *L-2*

YES

NO

DON'T
KNOW

c. Does each manifest (or a representative sample) have the following information?

- a manifest document number ✓
- the generator's name, mailing address, telephone number, and EPA identification number ✓
- the name, and EPA identification number of each transporter ✓
- the name, address and EPA identification number of the designated facility and an alternate facility, if any: ✓
- a description of the wastes (DOT) ✓
- the total quantity of each hazardous waste by units of weight or volume, and the type and number of containers as loaded into or onto the transport vehicle ✓
- a certification that the materials are properly classified, described, packaged, marked, and labeled, and are in proper condition for transportation under regulations of the Department of Transportation and the EPA ✓

→ Used ~~to~~ *Revised HW # FO15. Pertained to the same type of CN waste.*

(5) Were there any hazardous wastes stored on site at the time of the inspection? ✓

a. If "yes," do they appear properly packaged (if in containers) or, if in tanks, are the tanks secure? ✓

Seems surround the tanks

b. If not properly packaged or in secure tanks, please explain.

c. Are containers clearly marked and labelled? *N/A* —

d. Do any containers appear to be leaking? ✓

e. If "yes," approximately how many? —

RCR INSPECTION REVIEW SHEET

ATTACHMENT

L-4

10/11/7

Name of Facility - *RFE Industries*RCRA ID# - *NJD 055090815*Date of Inspection - *11-19-81*

Type of Inspection:

GENERATOR

Name of EPA/State Inspector -

Andrew Bellina EPA/SWB

DEC 2 3 30 PM '81

SECTION
NEW YORK

Findings of Inspection:

*265.15 - Inspection Schedule**265.16 - Personnel Training**265.51 - Contingency**265.110 - Closure Plan*

Action(s) Taken: *Informed contact of isolations. Contingency Plan is especially important due to the large volume of cyanide waste on site.*

Action(s) Recommended: *300B Warning Letter*

VISUAL OBSERVATIONS(5) SITE SECURITY (§265.14)

YES	NO	DON'T KNOW
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

- a. Is there a 24-hour surveillance system?
- b. Is there a suitable barrier which completely surrounds the active portion of the facility?
- c. Are there "Danger-Unauthorized Personnel Keep Out" signs posted at each entrance to the facility?

(6) Are there ignitable, reactive or incompatible wastes on site? (§265.27)

- a. If "YES", what are the approximate quantities?

3,000 gal - D003

- b. If "YES", have precautions been taken to prevent accidental ignition or reaction of ignitable or reactive waste?

- c. If "YES", explain

tanks separated w/ PRV's

- d. In your opinion, are proper precautions taken so that these wastes do not:

- generate extreme heat or pressure, fire or explosion, or violent reaction?
- produce uncontrolled toxic mists, fumes, dusts, or gases in sufficient quantities to threaten human health?
- produce uncontrolled flammable fumes or gases in sufficient quantities to pose a risk of fire or explosions?
- damage the structural integrity of the device or facility containing the waste?
- threaten human health or the environment?

Please explain your answers, and comment if necessary. *PRV's may release toxic fumes.*

- e. Are there any additional precautions which you would recommend to improve hazardous waste handling procedures at the facility?

no

(7) Does the facility comply with preparedness and prevention requirements including maintaining: (§265.31)

ATTACHMENT *late*
 YES NO KNOW

- an internal communications or alarm system? ☒ YES ☐ NO ☐ KNOW
- a telephone or other device to summon emergency assistance from local authorities? ☒ YES ☐ NO ☐ KNOW
- portable fire equipment? ☒ YES ☐ NO ☐ KNOW
- adequate aisle space? *N/A* ☐ YES ☐ NO ☐ KNOW
- in your opinion, do the types of wastes on site require all of the above procedures, or are some not needed? Explain. ☐ YES ☐ NO ☐ KNOW

all are needed except adequate aisle space.

In your opinion, do the types of wastes on site require all of the above procedures, or are some not needed? Explain.

- (8) Have you inspected to verify that the groundwater monitoring wells (if any) mentioned in the facility's groundwater monitoring plan (see no. 19 below) are properly installed? *N/A* ☐ YES ☐ NO ☐ KNOW

If you have, please comment, as appropriate.

- (9) a. Is there any reason to believe that groundwater contamination already exists from this facility? *N/A* ☐ YES ☐ NO ☐ KNOW
 If "YES", explain.
- b. Do you believe that operation of this facility may affect groundwater quality? ☐ YES ☐ NO ☐ KNOW
- c. If "YES", explain.

RECORDS INSPECTION

- (10) Has the facility received hazardous waste from an off-site source since Nov. 19, 1980 (effective date of the regulations)? ☒ YES ☐ NO ☐ KNOW

- a. If "YES", does it appear that the facility has a copy of a manifest for each hazardous waste load received? ☐ YES ☐ NO ☐ KNOW
- b. How many post-November 19 manifests does it have? (If the number is large, you may estimate)
18 manifests
- c. Does each manifest (or a representative sample) have the following information?

- a manifest document number ☒ YES ☐ NO ☐ KNOW

*(6) Has the generator submitted an annual report to EPA covering the previous calendar year?

a. How do you know?

N/A

(7) Has the generator received signed copies (from the TSD facility) of all manifests for wastes shipped off site more than 35 days ago?

a. If "no," have Exception Reports been submitted to EPA covering these shipments?

(8) General comments.

All HW shipped to SCA, Newark.
Facility notified as transporter, but has not
transported any HW since Nov. 19, 1980.

* The effective date for this requirement is March 1, 1982.

YES NO

DO NOT KNOW

- the generator's name, mailing address, telephone number, and EPA identification number
- the name, and EPA identification number of each transporter
- the name, address and EPA identification number of the designated facility and an alternate facility, if any;
- a DOT description of the wastes
- the total quantity of each hazardous waste by units of weight or volume, and the type and number of containers as loaded into or onto the transport vehicle
- a certification that the materials are properly classified, described, packaged, marked, and labeled, and are in proper condition for transportation under regulations of the Department of Transportation and the EPA

d. Are there any indications that unmanifested hazardous wastes have been received since November 19, 1980? If YES, explain.

(11) Does the facility have a written waste analysis plan specifying test methods, sampling methods and sampling frequency? (§265.13)

- a. Does the character of wastes handled at the facility change from day to day, week to week, etc., thus requiring frequent testing? (You may check more than one)
Waste characteristics vary _____
All wastes are basically the same _____
Company treats all waste as hazardous _____
Don't know _____

b. Does hazardous waste come to this facility from off-site sources?

c. If waste comes from an off-site source, are there procedures in the plan to insure that wastes received conform to the accompanying manifest?

(12) INSPECTIONS (§265.15)

a. Does the facility have a written inspection schedule?

Claim that tanks are inspected daily.

b. Does the schedule identify the types of problems to be looked for and the frequency for inspections?

c. Does the owner/operator record inspections in a log?

d. Is there evidence that problems reported in the inspection log have not been remedied? If "YES," please explain.

YES NO ~~KNOW~~ DON'T

(13) PERSONNEL TRAINING (§265.16)

ATTACHMENT L-a

a. Is there written documentation of the following:

- job title for each position at the facility related to hazardous waste management and the name of the employee filling each job? ✓

- type and amount of training to be given to personnel in jobs related to hazardous waste management? ✓

- actual training or experience received by personnel?

(14) *Claims that on the job training is intensive and carefully monitored*
Does the facility have a written contingency plan for emergency procedures designed to deal with fires, explosion or any unplanned release of hazardous waste? ✓
(§265.51)

a. Does the plan describe arrangements made with local authorities? ✓

b. Has the contingency plan been submitted to local authorities? ✓

How do you know?

c. Does the plan list names, addresses, and phone numbers of Emergency Coordinators? ✓

d. Does the plan have a list of what emergency equipment is available? ✓

e. Is there a provision for evacuating facility personnel? ✓

f. Was an Emergency Coordinator present or on call at the time of the inspection? ✓

(15) Does the owner/operator keep a written operating record with: (§265.73)

not needed, wastewaters are basically the same and go directly to tanks for storage
- a description of wastes received with methods and dates of treatment, storage or disposal? ✓

- location and quantity of each waste? ✓

- detailed records and results of waste analysis and treatability tests performed on wastes coming into the facility? ✓

- detailed operating summary reports and description of all emergency incidents that required the implementation of the facility contingency plan? ✓

*(16) Does the facility have written closure and post-closure plans? (§265.110) ✓

a. Does the written closure plan include:

- a description of how and when the facility will be partially (if applicable, and ultimately closed? ✓

YES N DON'T
KNOW

ATTACHMENT L-10

- an estimate of the maximum inventory of wastes in storage or treatment at any time during the life of the facility?

— / —

- a description of the steps necessary to decontaminate facility equipment during closure?

— ✓ —

- a schedule for final closure including the anticipated date when wastes will no longer be received and when final closure will be completed?

— ✓ —

b. What is the anticipated date for final closure?

— ✓ —

tc. Does the owner/operator have a written post-closure plan identifying the activities which will be carried on after closure and the frequency of these activities?

— ✓ —

d. Does the written post-closure plan include:

- a description of planned groundwater monitoring activities and their frequencies during post-closure?

n/app

— — —

- a description of planned maintenance activities and frequencies to ensure integrity of final cover during post-closure?

— — —

- the name, address and phone number of a person or office to contact during post-closure?

— — —

*(17) Does the owner/operator have a written estimate of the cost of closing the facility? (\$265.142) What is it?

— ✓ —

*(18) Does the owner/operator have a written estimate of the cost for post-closure monitoring and maintenance? What is it? (\$265.144)

n/app

— — —

*(19) Has a groundwater monitoring plan been submitted to the Regional Administrator for facilities containing a surface impoundment, landfill or land treatment process? (This requirement does not apply to recycling facilities.) (\$265.90)

n/app

— — —

a. Does the plan indicate that at least one monitoring well has been installed hydraulically upgradient from the limit of the waste management area?

— — —

b. Does the plan indicate that there are at least three monitoring wells installed hydraulically downgradient at the limit of the waste management area?

— — —

SITE-SPECIFIC

Please circle all appropriate activities and answer questions on indicated pages for all activities circled. When you submit your report, include only those site-specific pages that you have used.

<u>STORAGE</u>	<u>TREATMENT</u>	<u>DISPOSAL</u>
Waste Pile p. 9	Tank p. 8	Landfill pp. 10-11
Surface Impoundment p. 8	Surface Impoundment pp. 8-9	Land Treatment pp. 9, 10
Container p. 7	Incineration pp. 12-13	Surface Impoundment p. 8
<u>Tank, above ground p. 8</u>	Thermal Treatment pp. 12-13	Other _____
Tank, below ground p. 8	Land Treatment pp. 9-10	
Other _____	Chemical, Physical p. 13 and Biological Treatment (other than in tanks, surface impoundment or land treatment facilities)	

*listed so on
part A but does
not presently store
HW in drums.*

CONTAINERS (\$265.170)

- | | <u>YES</u> | <u>NO</u> | <u>DON'T KNOW</u> |
|--|------------|-----------|-------------------|
| 1. Are there any leaking containers?
If "YES", explain. | _____ | _____ | _____ |
| 2. Are there any containers which appear in danger of leaking?
If "YES", explain. | _____ | _____ | _____ |
| 3. Do wastes appear compatible with container materials? | _____ | _____ | _____ |
| 4. Are all containers closed except those in use? | _____ | _____ | _____ |
| 5. Do containers appear to be opened, handled or stored in a manner which may rupture the containers or cause them to leak? | _____ | _____ | _____ |
| 6. How often does the plant manager claim to inspect container storage areas? | _____ | _____ | _____ |
| 7. Does it appear that incompatible wastes are being stored in close proximity to one another?
If "YES", explain. | _____ | _____ | _____ |
| 8. Are containers holding ignitable or reactive wastes located at least 15 meters (50 feet) from the facility's property line? | _____ | _____ | _____ |
| 9. What is the approximate number and size of containers with hazardous wastes? | _____ | _____ | _____ |

ATTACHMENT 1-12TANKS (\$265.190)

YES	NO	DON'T KNOW
—	✓	—
—	✓	—
—	✓	—
—	—	—
—	✓	—
—	✓	—
—	✓	—

1. Are there any leaking tanks?
If "YES", explain.

2 - 5,000 gal tanks

2. Are there any tanks which appear in danger of leaking.
If "YES", explain.

3. Are wastes or treatment reagents being placed in tanks which could cause them to rupture, leak, corrode or otherwise fail?
If "YES", explain.

4. Do uncovered tanks have at least 2 feet of freeboard or an adequate containment structure?

All tanks are covered.

5. Where hazardous waste is continuously fed into a tank, is the tank equipped with a means to stop this inflow?

6. Does it appear that incompatible wastes are being stored in close proximity to one another, or in the same tank?
If "YES", explain.

Tanks are separately lined

7. How often does the plant manager claim to inspect container storage areas?

Daily

8. Are ignitable or reactive wastes stored in a manner which protects them from a source of ignition or reaction?
If "YES", explain.

9. What is the approximate number and size of tanks containing hazardous wastes?

SURFACE IMPOUNDMENTS (\$265.220)

1. Is there at least 2 feet of freeboard in the impoundment?
2. Do all earthen dikes have a protective cover to preserve their structural integrity?
If "YES", specify type of covering.
3. Is there reason to believe that incompatible wastes are being placed in the same surface impoundment?
If "YES", explain.

MALCOLM
PIRNIE

NJDEP Preliminary Assessments

TELEPHONE CALL CONFIRMATION

Site Number: 310

Site Name: RFE INDUSTRIES

Local _____ Long Distance 609-984-4843

Date 5/18/86

To/From RECH CESTONE(?) NJDEP/DWM - BUL OF HAZ WASTE

Time _____

ENGINEERING

Project Prel. Assess

MPI Name MARK SADDUSKI

Proj. No. 835-08-1100

Subject: RCRA

- NO MAJOR ENFORCEMENT CURRENTLY UNDER WAY AT RFE
- RFE WILL BE SUBMITTING A RCRA PART B PERMIT BEFORE YEARS END.

RFE RECLAIMS GOLD FROM OIL & OLD ELECTRICAL EQUIPMENT
NOXIOUS WASTE FROM CYCLONE & RAIL STATION IN DRUMS
AND TANKS

Route to:

File:

**MALCOLM
PIRNIE****OFF - SITE RECONNAISSANCE**Date: MAY 8, 1986

Time In _____ Out _____

Site ID No. 370Site Name: RFE INDUSTRIES

Location: _____

Address: 35-39 AETHA STREETCity, County Jersey City NJZip: 07302Personnel: MARK V SADOWSKITitle: PROJECT ENGINEER

Conditions: _____

Temperature: _____

Any evidence of imminent hazard? _____

Illegal Dumping? _____

Uncapped Monitoring Wells? _____

If Yes, Notify NJDEP

Signature: Mark V Sadowski

Date: _____

Witness: _____

Date: _____

Site: RFE INDUSTRIES

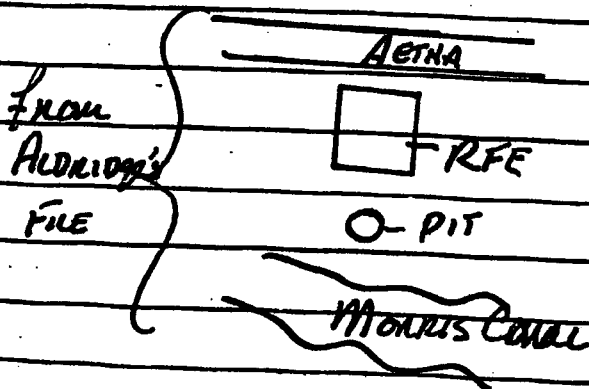
Site ID No. 370

Date: 5/8/86

- ① - AETNA STREET - SMALL ONE LANE DRIVEWAY WAS ABLE TO DRIVE UP TO EAST SIDE OF PROPERTY BEFORE BEING STOPPED BY PARKED TRUCKS.
- AREA VERY POORLY MAINTAINED - JUNK YARDS, SCRAP METAL.
 - RFE - SMALL BLDG, COULD NOT SEE BEHIND, POOR HOUSEKEEPING.

② INTERVIEW WITH TEX ALDRIDGE - JERSEY CITY ENVIRONMENTAL TECH:

- SAMPLING DONE IN 8/84 OF SOME CONCRETE? - 97 PPM LEAD
- 6/1981 CITY COMPLAINT ABOUT LEAKING POND PIT BEHIND BLDG. RFE REMOVED PIT 6/30/81 BUT DID NOT CLEAN UP SOILS.



③ TAX ASSESSOR:

JJ CAVALLONE
35-39 AETNA ST
JERSEY CITY NJ 07302
BL 2145
L 41.R; 41.S.

Signature:

Mark V. [Signature]

Date:

Witness:

Date:

Subject: RFESite ID No. 370Date: 5/8/86

Page No.

ASA: 100

Frame No: Object photographed:* Location of photographer:* Compass heading:

1RFE BLDGAETNA STW

* Indicate on sketch or map if possible

Signature: Mark V. McDonoughDate: 5/8/86

Witness:

Date:

MALCOLM
PIRNIE

MAPS AND SKETCHES

Page 4 of 4

Site:

370

ID No.

RFE

GRAND AVENUE

JERSEY AVE

North

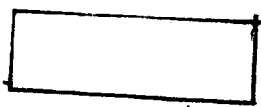
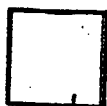
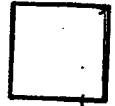
NJ TURNPIKE

JUNK YARDS

JUNK YARDS

BLOCKED W/ TRUCKS AETNA ST

SCRAP METAL



PITTSBURGH RFE INDUSTRIES
METALS

U.S. LIGNUM
SANDUST

SCHAIKNE - BONOMO
SALVAGE

Morris Canal

LIBERTY STATE PARK

Signature:

Mark V. Sadorski

Date:

May/8/86

Witness:

NJDEP PRELIMINARY ASSESSMENTS

MARCH TO JUNE, 1986

FILE REVIEW SUMMARY

Site Name: RFE Industries

Site Number: 370

	SEARCH DATE	REVIEWED BY	STATUS*
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New Jersey Department of Environmental Protection:
Central Files:

DWM	<u>4/30/86</u>	<u>JRC/TMK</u>	_____
DWR	<u>4/17/86</u>	<u>BLK</u>	_____
HSMA	<u>4/30/86</u>	<u>JRC/TMK</u>	_____
Environmental Qual.	<u>4/30/86</u>	<u>JRC/TMK</u>	_____
Office of Sci. & Res.	<u>4/30/86</u>	<u>JRC/TMK</u>	_____

Field Office: Metro

DWM	<u>5/5/86</u>	<u>REP</u>	_____
DWR	<u>5/5/86</u>	<u>REP</u>	<u>X</u>
Env. Qual. File # 10348	<u>5/5/86</u>	<u>REP</u>	<u>X</u>

U.S. Environmental Protection Agency:

Edison	<u>4/28/86</u>	<u>JRC</u>	_____
Federal Plaza	_____	_____	_____

Local Health Offices:

<u>Trenton City</u>	<u>5/8/86</u>	<u>MVS</u>	<u>INTERVIEWED</u>
<u>Hudson Regional</u>	<u>5/11/86</u>	<u>MMA</u>	<u>HEALTH OFFICER -</u>
			<u>NO Documentation</u>
			<u>COPIED</u>

Notes: X

* An 'X' indicates information was retrieved from file, a blank line indicates no information was found.

MALCOLM
PIRNIE

SITE NAME: RFE Industries

ID NO: _____

LOCATION: _____

FILE	SEARCH DATE	REVIEWER	RCRA 300I FORM	CERCLA 103C FORM	PRELIMINARY INSP. REPORT	FIELD INSPECTION REPORTS	AGENCY INTERNAL REPORTS	RESP. PARTY CORRESPONDENCE	FORMAL REPORTING DOCUMENTS	SITE SKETCHES	ANALYTICAL DATA	SECOND SEARCH DATE	REMARKS	QA CHECK
DEP Water Resource Metro Office	5/5/86	RP												

CODES:

- ✓ REVIEWED AND COPIED
- X REVIEWED BUT NOT COPIED
- NF NOT FOUND
- NA NOT APPROPRIATE

MALCOLM
PIRNIE

Preliminary Assessment Photo Log

SITE: _____

I.D. _____

DATE: _____

PHOTOS WILL BE SUPPLIED
AT A LATER DATE.



FRAME: _____ TIME: _____ DIRECTION: _____

DESCRIPTION: _____